



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604**

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
Glacier Fish Company & North Star Fishing Company, Seattle, WA

**FROM:** Daniel Heins, Environmental Scientist  
AECAB (IL/IN)

**THRU:** Nathan Frank, Section Supervisor  
AECAB (IL/IN)

**TO:** File

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**BASIC INFORMATION**

**Facility Name:** Glacier Fish Company; North Star Fishing Company

**Facility Location:** 2001 West Garfield Street  
Terminal 91, Bldg A-1, C-107  
Seattle, WA 98119

**Date of Inspection:** 8/31/2022

**EPA Inspector(s):**

1. Daniel Heins, Environmental Scientist

**Other Attendees:**

1. Natalie Frank, Safety and Compliance Manager – Glacier Fish Company

**Contact Email Address:** natalie@glacierfish.com

**Purpose of Inspection:** Ozone depleting substances/refrigerants compliance inspection

**Facility Type:** Seafood company

**Regulations Central to Inspection:** 40 CFR Part 82 Subpart F

**Arrival Time:** 10:40am

**Departure Time:** 12:00pm

**Inspection Type:**

- Unannounced Inspection  
 Announced Inspection

**OPENING CONFERENCE**

- Presented Credentials  
 Stated authority and purpose of inspection  
 Provided Small Business Resource Information Sheet (via email)  
 Small Business Resource Information Sheet not provided.  
 Provided CBI warning to facility

The following information was obtained verbally from Natalie Frank unless otherwise noted.

**Company Ownership:**

Glacier Fish Company (“Glacier Fish”) has partial ownership of and operates on behalf of North Star Fishing Company LLC (“North Star”), in addition to operating its own ships.

The Norton Sound Economic Development Corporation became a majority owner of Glacier Fish a little under a year ago.

**Process Description:**

Ships for Glacier Fish and North Star are factory trawlers that catch, process, and freeze fish all at sea. The fleet operates in the Bering Sea off Alaska. Ships typically are at sea from mid-winter through the fall, coming into Seattle for maintenance and repair in the fall and early winter.

When the ships come into port to unload their catch, it is immediately sold to distribution companies.

There are six ships between the two companies. Four ships use HCFC or HFC refrigerants (“freon”), and two use ammonia. The Alaska Ocean is the only ship with more than one refrigeration unit, with its two units referred to as the “Cascade System” and the “RFW” unit. The RFW system is the only unit using an HFC refrigerant, with all other freon units using R-22 (an HCFC).

See the following table for a summary of the Glacier Fish/North Star fleet’s refrigeration units:

Ship	Owner	Refrigerant Type	Full Charge Pounds of Freon	Automatic leak detection?
Alaska Ocean (2 units)	Glacier Fish	R-22 (Cascade) R-507 (RFW)	9,000 (Cascade) 1,500 (RFW)	No
Northern Glacier	Glacier Fish	R-22	7,000	Yes
Arica	North Star	R-22	10,000	Yes
Unimak	North Star	R-22	12,500	Yes
Cape Horn	North Star	Ammonia	N/A (Ammonia)	Yes
North Star	North Star	Ammonia	N/A (Ammonia)	Yes

**Staff Interview:**

Glacier Fish does not own or operate any onshore seafood processing or cold storage. Its onshore properties are its Seattle office on Terminal 91 and a warehouse in Dutch Harbor, Alaska.

Members of the ship crews perform quarterly leak checks on the refrigeration units. The company has a list of staff that are certified to do these checks. This is in addition to automatic leak detection on ships with automatic systems.

Bowman Refrigeration is contracted to do refrigerant addition and maintenance of the refrigeration units when the ships are in port in the fall/winter in Seattle.

In 2020, Glacier Fish decommissioned one of their ships, but recovered all the freon to be recycled into another ship. Natalie Frank stated that no other units have been decommissioned in the past three years.

All other refrigeration units for the galley and comfort cooling have less than 50 pounds of full charge of refrigerant.

Natalie Frank stated that she was unaware of any units that had shown annual leak rates above 125%.

**TOUR INFORMATION**

**EPA Tour of the Facility:** No

Only one of the company's vessels was in port at the time of the inspection, and it was in the process of preparing for imminent departure back to Alaska.

**Photos and/or Videos:** were not taken during the inspection.

**Field Measurements:** were not taken during this inspection.

**RECORDS REVIEW**

Natalie Frank displayed on her computer to EPA a report from the 2022 annual refrigeration unit maintenance for the Unimak, showing when the ship came into port in November, all refrigerant was pumped off and then returned in full in January before departure. No refrigerant was added to the system. The system was operating with less than full charge, which Natalie Frank stated is common for their units.

**CLOSING CONFERENCE**

Provided U.S. EPA point of contact to the facility

Daniel Heins informed Natalie Frank that EPA was looking into potential rule-writing for appliances using HFCs, pursuant to the AIM Act.

**Requested documents:**

- Last 12 months (or otherwise most recent) leak check / repair reports for each unit/ship containing freon with technician certifications
- Last two years reports of leak rate calculations and in-dock refrigeration unit repair reports for each unit/ship containing freon
- Last two years of annual calibration reports for the automatic leak detection systems for each applicable unit/ship containing freon

**DIGITAL SIGNATURES**

Report Author: \_\_\_\_\_

Section Supervisor: \_\_\_\_\_